

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

JOSEPH PERCOCO, a/k/a "Herb,"
ALAIN KALOYEROS, a/k/a "Dr. K.,"
PETER GALBRAITH KELLY, JR., a/k/a "Braith,"
STEVEN AIELLO,
JOSEPH GERARDI,
LOUIS CIMINELLI,
MICHAEL LAIPPLE, and
KEVIN SCHULER,

Defendants.

No. S1 16 Cr. 776 (VEC)

Oral Argument Requested

**DEFENDANT PETER GALBRAITH KELLY, JR.'S NOTICE OF MOTIONS
FOR A BILL OF PARTICULARS AND FOR BRADY MATERIAL,
AND JOINDER IN HIS CO-DEFENDANTS' MOTIONS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Peter Galbraith Kelly, Jr.'s Motion for a Bill of Particulars, Motion for Brady Material, and Joinder in His Co-Defendants' Motions, and upon the accompanying Declaration of Daniel M. Gitner, dated May 19, 2017, defendant Peter Galbraith Kelly, Jr., hereby moves this Court, before the Honorable Judge Valerie E. Caproni, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York, for an Order directing the Government to provide a bill of particulars, directing the Government to provide Brady material, granting him the relief sought in his co-defendants' motions, and for such other relief as the Court deems appropriate.


PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court's May 15, 2017 Order, opposition papers shall be served upon the undersigned no later than June 30, 2017, and reply papers shall be served no later than July 21, 2017.

Dated: May 19, 2017
New York, NY

Respectfully submitted,

LANGLER SIFFERT & WOHL LLP

By:



Daniel M. Gitner
Jun Xiang
Samantha J. Reitz

500 Fifth Avenue
New York, NY 10110
(212) 921-8399

*Attorneys for Defendant
Peter Galbraith Kelly, Jr.*

TO: Clerk of the Court
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York